

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **MAR 11 2016**

OPEN HAND FOUNDATION
[REDACTED]

Employer Identification Number:
30-0827510

DLN:
[REDACTED]

Contact Person:
[REDACTED]

Contact Telephone Number:
[REDACTED]

60-Month Period Begins:

January 1, 2016

60-Month Period Ends:

December 31, 2020

Addendum Applies:

No

Dear Applicant:

We received your notification of intent to terminate your private foundation status under Internal Revenue Code (IRC) Section 507(b)(1)(B) during the 60-month period listed at the top of this letter. This letter could help resolve questions on your foundation status. Please keep it for your records.

You intend to operate as a public charity described in IRC Section 509(a)(2) during the 60-month period. Based on your proposed activities and support, we agree you can terminate your private foundation status, and we'll treat you as a public charity described in that Section for the 60-month advance ruling period.

Within 90 days after the end of your 60-month period, you must show you've met the requirements as a public charity described in IRC Section 509(a)(1), (2), or (3) for the 60-month period. If you show this, you'll be classified under that Section for all purposes from the beginning of the 60-month period and thereafter, as long as you continue to meet those requirements. Also, if you satisfy the requirements of IRC Section 507(b)(1)(B) at the end of your 60-month period, you won't be subject to the provisions of IRC Section 507(a), (c), or (g). However, if you don't meet these requirements for the 60-month period, you'll be classified as a private foundation for the entire period.

You'll be liable for interest under IRC Section 6601 if you don't pay the tax imposed by Section 4940 for any taxable years during the 60-month period and we subsequently determine you owe the tax for such years. However, we won't charge the penalty under Section 6651, with respect to the tax imposed by Section 4940, because failure to pay such taxes during the 60-month period is due to reasonable cause.

You're required to file Form 990-PF, Return of Private Foundation or Section 4947(a)(1) Trust Treated as Private Foundation, until you complete your 60-month termination and are classified as a public charity.

Letter 2245